

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

AVR GROUP, LLC, TRIDENT ASSET)	
MANAGEMENT, INC., MICHAEL)	
DZIURGOT, individually and as the)	
representatives of a class of similarly-)	
situated persons,)	Civil Action No.: 1:24-cv-20755
)	
Plaintiff,)	
)	
v.)	
)	
ALEBRIJE ENTERTAINMENT LLC,)	
CRAIG COLE, MATTHEW COLE,)	
GUSTAVO MONTAUDON, and John)	
Does 1-10,)	
)	
Defendants.)	

**PLAINTIFFS' UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO
DEFENDANTS' MOTIONS TO DISMISS**

Plaintiffs, AVR GROUP, LLC, TRIDENT ASSET MANAGEMENT, INC., MICHAEL DZIURGOT, by and through their attorneys, on an unopposed basis, pursuant to Local Rule 7.1(a)(1)(J) and (2), moves for an extension of time to respond to Defendants' Motions to Dismiss (D.E. 40, 43, 45):

1. Before this action was reassigned (*see* D.E. 25), District Judge Kathleen M. Williams entered an Order (D.E. 22) requiring Defendants to respond to the Class Action Complaint (either jointly or, after obtaining leave of Court, separately) on or before April 22, 2024.

2. Since then, without opposition from Plaintiffs, the Court has granted leave and extensions of time to Defendants. (D.E. 29, 30, 34).

3. Plaintiffs request a brief extension of time, until June 14, 2024, to respond to all three Defendants' Motions to Dismiss.

4. Plaintiffs' Counsel will be traveling the week of the Memorial Day Holiday and has other pending matters previously scheduled before the schedule for Motions to Dismiss in this

matter was altered by this Court's Order allowing for separate Motions to Dismiss.

5. This Motion is brought in good faith and not for any improper purpose, such as to delay this action. No party will be prejudiced by the relief sought herein.

6. Defendants do not oppose this Motion.

7. A proposed order granting this Motion is attached hereto as Exhibit 1.

WHEREFORE, defendant Craig Cole respectfully requests that the Court enter an Order granting him an extension of time (through April 26, 2024) to respond to the Class Action Complaint and any other relief the Court deems just and proper.

Dated: May 10, 2024

Respectfully submitted,

AVR GROUP, LLC, TRIDENT ASSET
MANAGEMENT, INC., MICHAEL DZIURGOT,

By: /s/ Ross M. Good
Ross M. Good – FL Bar No.: 116405

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Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on May 10, 2024, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record via transmission of Notices of Electronic Filing generated by CM/ECF.

By: /s/ Ross M. Good
Ross M. Good